Cc: Albright, David[Albright.David@epa.gov]
To: McWhirter, Lisa[McWhirter.Lisa@epa.gov]

From: Dermer, Michele

Sent: Thur 1/22/2015 9:04:27 PM

The California Department of Oil, Gas and Geothermal Resoucres (DOGGR) received Class II primacy in March 1983 at which time EPA approved numerous aquifer exemptions. The vast majority of these exemptions were for injection into hydrocarbon-bearing zones. As a result of a 2011 EPA audit and 2012 EPA aquifer exemption review, Region 9 discovered that Class II injection activities were taking place in California into aquifers that were non-exempt.

On July 17, 2014, EPA issued a letter to DOGGR to require improvements in its regulation of Class II program .

In July of last year DOGGR began issuing orders to operators to cease injection into aquifers that have not been exempted by EPA and which may pose a risk to public health. On December 22, 2014, EPA Region 9 issued a second letter to DOGGR to provide a status of the State Response to EPA's July 17 letter. A comprehensive plan is due **February 6, 2015**. The goal is to bring the Class II UIC program into compliance by **February 15, 2017**.